

PUBLIC SUBMISSION

As of: November 10, 2010
Received: November 08, 2010
Status: Posted
Posted: November 10, 2010
Tracking No. 80b84c2c
Comments Due: November 08, 2010
Submission Type: Web

Docket: EPA-R03-OW-2010-0736

Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0487

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Submitter Information

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General Comment

As someone involved in farming within New York's Chesapeake Bay Watershed area, I urge the Environmental Protection Agency (EPA) to revise New York's Chesapeake Bay Total Maximum Daily Load (TMDL) allocation to a realistic and attainable standard that recognizes the good work New York farmers have done to protect the Bay. EPA should accept NYS Department of Environmental Conservation's (NYS DEC) Watershed Implementation Plan (WIP) which is an aggressive and realistic plan to protect water quality in New York's portion of the watershed.

Clean water is a priority of New York farmers, who have worked for many years to protect the state's water resources under the most progressive water quality standards in the country. The EPA should revise New York's Chesapeake Bay TMDL allocation to more adequately reflect NY's environmental achievements, be more proportionate in accordance with science, account for NY's decreasing environmental footprint over the past decade and reflect that NY's water quality chemistry already meets Bay specifications for high water quality as required by EPA's TMDL. New York's state-wide environmental program achievements, as well as its unique landscape, growing conditions and seasonality - which differ from the other five Bay watershed states - should all be accounted for in any Chesapeake Bay Program TMDL.

EPA should also adopt the model refinements recommended by the NYS DEC in their draft Phase I WIP. This plan provides adequate assurances of NY's ability to achieve stated nutrient reductions. The requested model refinements reflect the environmental protection accomplishments NYS has already attained and truthfully represents the practices of environmental stewardship currently employed on New York's family farms.

For these reasons, please revise New York's Chesapeake Bay Total Maximum Daily Load (TMDL) allocation to a realistic level and adopt the model refinements recommended by NYS DEC's WIP.

Thank you for your consideration.